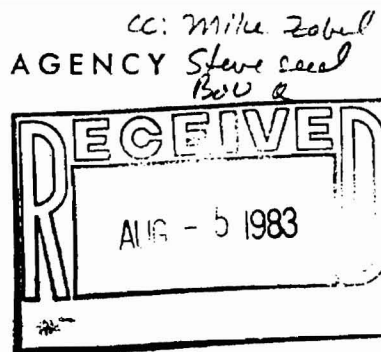




REPLY TO
ATTN OF:

M/S 533

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



} Please
note &
comply.
If you
have any
questions
lets discuss
next week.
Boye

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

COPY

Roger Nelson, Vice President
Chem-Security Systems, Incorporated
P. O. Box 1866
Bellevue, Washington 98009

Dear Mr. Nelson:

This is a partial response to the meeting held on June 9, 1983 (from 2:00 p.m. to 3:30 p.m.) between representatives of the U.S. Environmental Protection Agency (EPA) and Chem-Security Systems, Incorporated (CSSI). During that meeting, several issues were raised by CSSI concerning recent amendments of the currently effective Letter of Approval for disposal of certain waste polychlorinated biphenyls (PCB) at the CSSI site near Arlington, Oregon. The amendments were contained in EPA correspondence dated May 25, 1983.

Issues and Determinations

A summary of each issue raised by CSSI along with EPA's response and determination follows:

1. CSSI requested that Special Condition (8) b) be amended to allow analysis for PCB of a single composite sample resulting from combining representative samples taken from a maximum of ten 55-gallon drums prior to stabilization.

EPA has determined that such sampling and analysis is equivalent to that required for the 500-gallon portable tank. Therefore, Special Condition (8) b) is hereby revised and amended as follows:

- (8) b) Prior to stabilization of liquids for disposal, a representative sample shall be collected from each portable tank or other container. [Where the containers are of 55-gallon capacity or less, a representative sample shall be collected from each. Up to a maximum of ten such samples may be combined to form a single composite sample for analysis.] Each of these samples shall be analyzed for PCB concentration (in accordance with (8) a) i)) within 30 days of collection. A written record of analysis results for each sample shall be maintained by Chem-Security Systems and must be

available for inspection. Analysis results for each sample must be signed and dated by the individual responsible for the PCB concentration determination. Each sample (and corresponding laboratory analysis) must be recorded in a manner that provides for determining the disposal or storage location of the material sampled. (See Special Condition (37) b) for reporting requirements).

2. CSSI requested that the requirements for Test Well B-2, the observation well in Trench 5, and the lysimeter under the PCB portion of Trench 9 be modified to reflect conditions at the site.

EPA will make a determination on the Trench 5 observation well after receipt of a monitoring plan now being prepared by CSSI and to be submitted to EPA on or before August 15, 1983.

EPA has determined that the nonfunctional lysimeter in place under the PCB disposal portion of Trench 9 need not be replaced.

EPA has determined that the requirement for Test Well B-2 will be withdrawn. In order to ensure adequate environmental monitoring, Special Condition (24) will be revised. Revisions will be made after receipt of the monitoring plan now being prepared by CSSI which will be submitted to EPA on or before August 15, 1983.

3. CSSI requested that the requirement for total chlorinated organics analysis of ground water samples collected monthly be amended to allow analysis for total organic halogens.

EPA has determined that analysis for total organic halogens, rather than total chlorinated organics, satisfies the requirement. The change has been incorporated above in amended Special Condition (24). Additionally, "Total Organic Halogens" should be substituted for "Total Chlorinated Organics" throughout the approval document where it pertains to the analysis requirements of Special Conditions (24) and (25).

4. CSSI requested that Special Condition (37) b) be amended and suggested language to more clearly define this reporting requirement.

EPA has determined that this requirement will be amended to allow two business days for reporting. Where uncertainty exists pertaining to actual implementation of this reporting requirement, CSSI shall notify EPA of the situation and file the required report pursuant to Special Condition (37) b) unless EPA advises CSSI in writing not to do so. Special Condition (37) b) is hereby revised as follows:

(37) b) If Chem-Security Systems believes, or has reason to believe, that improper disposal or an environmental release of PCB has or might have occurred at the facility or during transport, the operator of the disposal site shall inform the EPA Region 10 office within two business days. A written report of the incident shall be submitted to EPA Region 10 within 2 weeks of the incident or of its initial discovery.

- * 5. CSSI requested that Special Condition (37) c) be amended to more clearly define this reporting requirement.

EPA has determined that this requirement will remain unchanged at this time. EPA will work with CSSI to resolve clearly defined issues as they are identified. Where uncertainty exists pertaining to actual implementation of this reporting requirement, CSSI shall notify EPA of the situation and file the required report pursuant to Special Condition (37) c) unless EPA advises CSSI in writing not to do so.

- * 6. CSSI requested that Special Condition (31) a) be revised to include Trench 7, which had previously been approved for PCB disposal by EPA.

EPA has determined that the omission of Trench 7 was inadvertant. Special Condition (31) a) is hereby revised as follows:

(31) a) No PCB wastes, nor wastes or materials of any kind, shall be placed or disposed of in approved PCB disposal trench areas (see Special Condition 11 for identification of approved PCB disposal trench areas) unless a written record of the placing or disposal of such waste or material is made contemporaneously. The exact location of each waste shall be included in the record with respect to a permanent, surveyed reference monument. The specific nature of each waste or material, including whether such waste is a PCB mixture, PCB article, PCB container, or PCB equipment, shall also be included in the record [see Special Conditions (32) and (34) for examples of the level of detail required in describing waste]. Such records shall also include three-dimensional burial coordinates.

7. CSSI requested that the EPA contact person for reporting purposes be clearly identified in the approval document.

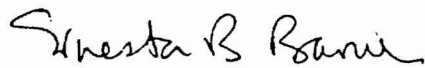
EPA has determined that the general language of the approval for reporting purposes is appropriate. Changes in EPA program and personnel responsibilities may occur while the reporting requirement remains constant. Identification of the appropriate EPA contact person will be managed outside the approval document. At the present time, verbal or written reports should be directed to the Chief of the RCRA Compliance and Permits Section, or the Acting Chief, at Mail Stop 533, telephone (206) 442-2803 (or 442-1260), unless such reporting is required to be submitted to the Regional Administrator.

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Please note that today's modification of the March 25, 1982 Letter of Approval in no way relieves CSSI of the regulatory and approval requirements for proper PCB disposal previously in effect.

Inquiries or correspondence concerning this matter should be directed to George C. Hofer, Chief, RCRA Compliance and Permits Section, U.S. Environmental Protection Agency, Mail Stop 533, 1200 Sixth Avenue, Seattle, Washington 98101, telephone (206) 442-2803.

Sincerely,

A handwritten signature in cursive script, reading "Ernesta B. Barnes".

Ernesta B. Barnes
Regional Administrator